

**IN THE UNITED STATES DISTRICT COURT  
for the  
Southern District of Texas  
Houston Division**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 4:12-CR-00503</b>
	)	
<b>v.</b>	)	
	)	
<b>JASON DANIEL GANDY,</b>	)	
	)	
<b>Defendant.</b>	)	

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**DEFENDANT JASON DANIEL GANDY UNOPPOSED MOTION TO CONTINUE  
MOTIONS DEADLINE AND TRIAL**

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TO THE HONORABLE LEE ROSENTHAL, CHIEF DISTRICT JUDGE FOR THE  
SOUTHERN DISTRICT OF TEXAS:

The Defendant, JASON DANIEL GANDY, in the above-styled and numbered cause, by and through the undersigned counsel, respectfully moves this Court for a continuance of the motions deadline and trial. In support of this motion, the Defendant would show the Court as follows:

1. JASON DANIEL GANDY is charged with one count of transportation of minors, sexual exploitation of minors, and transportation of child pornography. The motions deadline is set for September 11, 2017. The pretrial conference is presently scheduled for October 2, 2017 at 9:00 a.m. and the jury trial is set for October 10, 2017 at 9am.

2. During his investigation and review of discovery, counsel was made aware of additional discovery that the Defense had not previously requested from the government but has compiled a list and sent that to the government today.

3. Additionally, Counsels ability to complete his investigation in this case has been hindered by the effects of Hurricane Harvey.

4. Counsel has conferred with Counsel for the Government and she has indicated that she does not oppose a motion for continuance.

5. This Motion is made not for purposes of delay but in the best interests of justice. Failure to grant said motion would result in a miscarriage of justice.

7. Defendant respectfully request this Court grant his Unopposed Motion to Continue Motions Deadline and Trial and issue new deadlines considering a continuance of approximately 90 days.

Respectfully submitted,

GRECO ♦ NEYLAND, PC

/s/ Dustan Neyland  
DUSTAN NEYLAND  
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CERTIFICATE OF CONFERENCE

On September 6, 2017, counsel for Defendant conferred with AUSA Sherri Zack concerning her position on Defendant's Motion for Continuance and was informed that she is unopposed.

/s/ Dustan Neyland  
DUSTAN NEYLAND

CERTIFICATE OF SERVICE

I hereby certify that on September 7, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to AUSA Sherri Zack .

/s/ Dustan Neyland  
DUSTAN NEYLAND